



California Fair Political Practices Commission

March 10, 1989

Judy Anne Harper
Vice-President - Finance
TCS Enterprises, Inc.
10525 Vista Sorrento Parkway
Suite 101
San Diego, CA 92121-2746

Re: Your Request for Advice
Our File No. A-89-075

Dear Ms. Harper:

You requested information on behalf of TCS Enterprises, Inc. pertaining to the campaign provisions of the Political Reform Act of 1974.^{1/}

QUESTION

If a major donor makes contributions directly to or expends funds at the behest of candidates or committees totaling less than \$10,000 in a calendar year, does the entity incur filing obligations for that year?

CONCLUSION

A major donor committee is a committee that makes contributions directly to or expends funds at the behest of any number of candidates or committees aggregating \$10,000 or more in a calendar year. An individual or entity which does not qualify as a major donor committee during any calendar year is not required to file campaign statements for that year. Major donor committees terminate at the end of the year, and must requalify each calendar year before they incur any filing obligations for that year.

^{1/} Government Code Sections 81000-91015. All statutory references are to the Government Code unless otherwise indicated. Commission regulations appear at 2 California Code of Regulations Section 18000, et seq. All references to regulations are to Title 2, Division 6 of the California Code of Regulations.

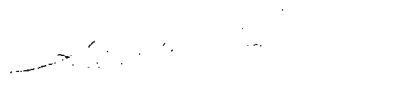
ANALYSIS

The Act requires a person or combination of persons to submit campaign disclosure statements in accordance with filing deadlines when it attains the status of a committee as defined in Government Code Section 82013. If all the contributions are of the type defined in Government Code Section 82013(c), an entity does not qualify as a committee and need not file until its contributions total ten-thousand dollars (\$10,000) or more during a calendar year. See 1988 FPPC "Campaign Information Manual" (copy enclosed), page 8, for a discussion of major donor qualification.

If you have further questions, please contact me at (916) 322-5662.

Sincerely,

Diane M. Griffiths
General Counsel


By: Sandra L. Taylor
Political Reform Consultant

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TCS ENTERPRISES, INC.

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January 30, 1989

Ms. Sandra Taylor
Fair Political Practices Commission
428 "J" Street
Sacramento, CA 95814

Dear Ms. Taylor:

Per our telephone conversation today, will you please confirm in writing that if a Major Donor makes contributions directly to or expends funds at the behest of candidates or committees totaling less than \$10,000.00 in a calendar year, that the Major Donor has no filing obligations for that year. As we discussed, our company, TCS Enterprises, Inc. and its Chief Executive Officer, Tom C. Stickel, would like a letter confirming these facts for our files. Thank you.

Sincerely,

Judy Anne Harper
Vice President - Finance

JAH/3f